

# FREEDOM *of* CONSCIENCE

## DEFENSE FUND

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December 26, 2017

**Via Electronic Filing**

The Honorable Magistrate Judge Donna Ryu  
United States District Court  
Northern District of California  
Oakland Courthouse, Courtroom 4 – 3rd Floor  
1301 Clay Street  
Oakland, CA 94612

**Re:    *Discovery Hearing in Planned Parenthood Federation of America et al. v. Center for Medical Progress et al. Case No. 3:16-cv-00236-WHO***

Dear Judge Ryu,

I represent Defendants Center for Medical Progress, BioMax Procurement Services, LLC, and Adrian Lopez in the above case.

Thank you for continuing the discovery hearing in this matter from December 21, 2017 to January 25, 2018. Unfortunately, my partner and I both have a pre-existing conflict on January 25 in another matter. I have conferred with Plaintiffs' counsel and the rest of Defendants' counsel, and they are all willing to continue the discovery hearing to the next available day on the Court's civil law and motion calendar – February 8, 2018. In the meantime, the parties are continuing to meet and confer to narrow issues before the Court. Therefore, if the Court is able to move the hearing from January 25 to February 8, then we would request that the Court also extend the deadline to apprise the Court of the matters still in dispute from January 10 to January 24. We look forward to hearing from the Court. Thank you.

Respectfully Submitted,

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/s/ Paul M. Jonna

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